DEPARTMENT OF MANAGEMENT
SERVICES
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LAWTON CHILES, GOVERNOR

WILLIAM H. LINDNER, SECRETARY

Division of Communications
Building 4030, Suite 235

May 28, 1996

Honorable William F. Caton, Secretary
Federal Communications Commission
1919 M Street NW, Suite 222
Washington, DC 20544

RE: WT Docket No. 96-86; DA 96-604 - Wireless Services; National Communications Services System Petition for Rulemaking

Dear Secretary Caton:

The Department of Management Services, Division of Communications, wholly supports the need to provide priority access to cellular spectrum for National Security/Emergency Preparedness. Since and during Hurricane Andrew, it has become apparent that "priority access" must be available to emergency response teams during disaster situations. In responding to this need, it is requested that the following be given consideration:

(1). Invocation of priority access should only be done during a disaster situation so declared by the President or the Governor of a State.

(2). Priority access would be limited to emergency response activities during a declared emergency.

(3). Priority access would be activated by the cellular provider at the request/direction of the appropriate government official.

(4). Activation of priority access should be the responsibility of the Emergency Support Function No. 2 (communication) and the State's Emergency Management.

(5). Based upon today's technology, it is our opinion that a feature code such as *XX can be readily cloned and utilized in a manner that could infringe upon priority access.

(6). It is our opinion that the most secure and positive approach would be to establish a "priority access" data base within the local cellular industry. This data base would contain the ESN/telephone number of phones that would have priority during a disaster. It would be the responsibility of the state/federal agencies to determine and provide the information needed to establish this data base. At the time of activation, roaming would be suspended for those outside their serving area. Access would be based upon next available channel rather than ruthless preemption. This approach provides the administrative control and access needed for emergency response.

Enclosed is a copy of the priority access that has been activated on a limited scale in the state and basically meets our stated needs.

I trust the expressed concerns will be explored and if further information is needed, please call me at (904) 488-3595.

Sincerely,

Glenn W. Mayne, Director
Division of Communications

GWM:FLH:cwk:gmcaton.ltr

Enclosure

cc + enc: Robert McNamara, Wireless Telecommunications Bureau

PRIORITY ACCESS

PRIORITY ACCESS

This feature allows a set of radio channels in any given cell or sector to be reserved for "priority" mobiles who are assigned based on a range of MID numbers.

Use of this feature will greatly increase the likelihood of preferred and elite mobiles receiving a voice channel during emergency situations.

- **Three levels of priority:**

  1) Elite

  2) Preffered

  3) Normal

- **Priority level can be set on a per cell or per sector basis.**

- **The default priority level is "normal".**

PRIORITY ACCESS

- Priority levels are set on a per cell or per sector basis as follows:

  - % of channels busy in sector/cell before cell/sector is placed in elite mode.

  - % of channels busy in sector/cell before cell/sector is deactivated from elite mode.

  - % of channels busy in sector/cell before cell/sector is placed in preferred mode.

  - % of channels busy in sector/cell before cell/sector is deactivated from preferred mode.

EMAMPLE:

In Cell #5 (omni/omni)

Elite ON = 85%
Elite OFF = 80%

Preferred ON = 70%
Preferred OFF = 65%

In Cell #7, Sector #3

Elite ON = 85%
Elite OFF = 80%

Preferred ON = 70%
Preferred OFF = 65%

PRIORITY ACCESS

Assigning Priority levels to subscribers

- Up to 10 groups of prefferred or elite mobiles will be allowed
- Each group can contain up to 10,000 mobile IDs
- The range of numbers in each group will be defined by indicating the lowest and highest mobile ID numbers in the group.

Example: For a group of 100 subscribers

LOW MID	123-455-0000
HIGH MID	123-455-0099
Group Number:	07

Example: For a group of 10,000 subscribers

LOW MID:	123-456-0000
HIGH MID:	123-456-9999
GROUP Number:	08

PRIORITY ACCESS

Mobile - to - Land Calls:

On mobile-to-land calls, the system will block the origination if the mobile does not have the appropriate priority access level to meet the sector or cell's current priority requirement.

Land - to - Mobile Calls:

Land originated calls proceed as normal until the mobile acknowledges the page. At that point the mobile's priority level will be compared to the current priority level of the sector or cell. If the mobile meets the priority requirements, a channel will be assigned and the mobile's priority level will be returned to the EMX. If the mobile does not have the required priority level, the call will not be allowed.

Mobile - to - Mobile Calls:

On mobile-to-mobile calls, the originating mobile will gain access to the system based on its priority level. If the originating mobile does not have the appropriate priority level to meet the sector or cell's current priority requirement, the call will not be allowed. If the originating mobile can meet the priority level of the originating cell, the EMX will compare the originating mobile's priority with the priority of the terminating mobile and select the greater priority as the priority of the call. If the call's priority is high enough to gain access in the terminating cell, the call will proceed. If the call's priority is not high enough to gain access in the terminating cell the call will not be allowed.

PRIORITY ACCESS

The system operator has control over the following features:

- The number of repages to a priority mobile during an all channels busy condition (0 - 5 repages).
- Blocking of handoffs from a non-priority subscriber to a target cell that has priority access activated.
- Force disconnect of non-priority mobiles.
  If mobiles are force disconnected, the subscriber will receive a burst of tone and will have 20 seconds to disconnect before a force disconnect occurs.
- Specify which recorded announcement is to used if a mobile is being repaged (RANN 0 - 10).